



## Department of the Treasury Financial Crimes Enforcement Network

Subject: **Instructions for Backfiling and Amending Currency Transaction Reports**  
Issued: October 27, 2014

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Please be informed that filing FinCEN reports in a complete, accurate, and timely manner is part of a sound compliance program and is essential to maintaining data integrity for law enforcement purposes. The CTR backfiling and amending process does not minimize the responsibility of financial institutions for implementing a compliance program that ensures the correct completion and timely submission of FinCEN Reports.

As of March 31, 2013, financial institutions are required to file the Financial Crimes Enforcement Network Currency Transaction Report (FinCEN CTR). The previous Currency Transaction Report and the Currency Transaction Report for Casinos will not be accepted and amendments to these reports must be submitted using the FinCEN CTR. Reports must be filed within **60 calendar days** of receipt of FinCEN's determination, unless otherwise instructed. When submitting the reports, the financial institution must follow the instructions that correspond with the appropriate filing method, as follows:

### **I. Discrete Bank Secrecy Act (BSA) E-Filing of FinCEN CTRs:**

The financial institution is required to submit FinCEN CTRs through the BSA E-Filing System in accordance with BSA electronic filing requirements.<sup>1</sup> The financial institution should ensure that the electronic file submission includes:

- For Backfiling matters, select Item 1 "FinCEN directed Backfiling"; or
- For Amendment matters, select Item 1 "Correct/amend prior report" and complete the Document Control Number (DCN)/BSA Identifier field.

After the financial institution has filed the FinCEN CTRs, it must send a letter confirming that the reports have been backfiled and/or amended. The letter should be addressed to FinCEN with copies sent to those federal and state agencies that examine the financial institution's Bank Secrecy Act/Anti-Money Laundering Compliance Program. The letter must include the following information:

- If not previously provided in writing, a written explanation of why the FinCEN CTRs were not filed correctly; and
- A list of the FinCEN CTRs with the 14-character **all** numerical BSA Identifiers, transaction dates, and transaction amounts.
- Financial institution contact person name, telephone number, and email address.

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<sup>1</sup> <http://bsaefiling.fincen.treas.gov/news/FinCENCTRElectronicFilingRequirements.pdf>

Do not include copies of completed FinCEN CTRs with the letter. The letter will serve as confirmation that the FinCEN CTR backfiling and/or amendment process has been completed; FinCEN suggests that the financial institution retain a copy of the letter for recordkeeping purposes.

## **II. Batch BSA E-Filing of FinCEN CTRs:**

The financial institution is required to submit FinCEN CTRs through the BSA E-Filing System. The FinCEN CTRs should be filed in accordance with BSA electronic filing requirements.<sup>2</sup> The financial institution should ensure that the electronic file submission includes:

- For Backfiling matters, enter “C” in field position 8 of the transaction summary (3A) record; or
- For Amendment matters, enter “B” in field position 8 of the transaction summary (3A) record, and enter the previously assigned DCN or BSA Identifier in field positions 9-22 of the transaction summary (3A) record.

After the financial institution has filed the FinCEN CTRs, it must send a letter confirming that the reports have been backfiled and/or amended. The letter should be addressed to FinCEN with copies sent to those federal and state agencies that examine the financial institution’s Bank Secrecy Act/Anti-Money Laundering Compliance Program. The letter must include the following information:

- If not previously provided in writing, a written explanation of why the FinCEN CTRs were not filed correctly; and
- A list of the FinCEN CTRs with the 14-character **all** numerical BSA Identifiers, transaction dates, and transaction amounts.
- Financial institution contact person name, telephone number, and email address.

Do not include copies of completed FinCEN CTRs with the letter. The letter will serve as confirmation that the FinCEN CTR backfiling and/or amendment process has been completed; FinCEN suggests that the financial institution retain a copy of the letter for record keeping purposes.

## **III. E-Filing of FinCEN Designation of Exempt Person (FinCEN DOEP):**

In the event that FinCEN has granted regulatory relief for a bank to file a FinCEN DOEP in lieu of backfiling or amending the affected FinCEN CTRs and the bank chooses to exempt an eligible customer, the bank is required to file a FinCEN DOEP through the BSA E-Filing System. The FinCEN DOEP should be completed in accordance with BSA electronic filing requirements.<sup>3</sup> After the bank has transmitted the FinCEN DOEP, it must send a letter to

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<sup>2</sup> <http://bsaefiling.fincen.treas.gov/news/FinCENCTRElectronicFilingRequirements.pdf>

<sup>3</sup> <http://bsaefiling.fincen.treas.gov/news/FinCENDOEPElectronicFilingRequirements.pdf>

FinCEN with copies sent to those federal and state agencies that examine the financial institution's Bank Secrecy Act/Anti-Money Laundering Compliance Program including the following information:

- Assigned 14-character **all** numerical BSA ID number from FinCEN DOEP electronic filing.
- Financial institution contact person name, telephone number, and email address.

Do not include copies of completed FinCEN DOEPs with the letter. The letter will serve as confirmation that the FinCEN DOEP process has been completed; FinCEN suggests that the financial institution retain a copy of the letter for record keeping purposes.

### **III. Notifying FinCEN of Backfiled and Amended FinCEN CTRs:**

When providing a letter confirming that FinCEN CTRs have been backfiled and/or amended using the discrete or batch e-filing method indicated above or that a FinCEN DOEP was submitted, the letter must be emailed, mailed, or faxed within **60 calendar days** of receipt of FinCEN's determination, unless otherwise instructed, to:

Email:     [fincenreports@fincen.gov](mailto:fincenreports@fincen.gov). You must encrypt your email or password protect email attachment(s) and send your password in a separate email. When encrypting a file, the password must be at least eight characters long, must include at least one lowercase, one uppercase, one numeric, and one special character. Note: FinCEN will not access email sent through third party email systems. Please submit all correspondence directly to [fincenreports@fincen.gov](mailto:fincenreports@fincen.gov) and follow encryption instructions.

Mail:        U.S. Department of Treasury  
Financial Crimes Enforcement Network  
Attention: CTR Backfile/Amendment Determinations  
Post Office Box 39  
Vienna, VA 22183

Fax:         202-354-6411

### **Questions:**

If you have questions regarding backfiling or amending FinCEN CTRs, please contact FinCEN's Regulatory Help Line at 1-800-949-2732. If you have questions related to BSA E-Filing or would like assistance in enrolling in BSA E-Filing, please contact the BSA E-Filing Help Desk at 1-866-346-9478, or via email at [BSAEFilingHelp@fincen.gov](mailto:BSAEFilingHelp@fincen.gov).

If you have questions about a specific DOEP and/or CTR backfiling or amendment determination request that you have submitted, please email your inquiry to [fincenreports@fincen.gov](mailto:fincenreports@fincen.gov).